UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

CITIZENS FOR CONSUMER JUSTICE,
COLORADO PROGRESSIVE COALITION,
CONGRESS OF CALIFORNIA SENIORS,
FLORIDA ALLIANCE FOR RETIRED
AMERICANS, HEALTH CARE FOR ALL, INC.,
MASSACHUSETTS SENIOR ACTION COUNCIL,
MASSPIRG, MINNESOTA SENIOR
FEDERATION, NEW JERSEY CITIZEN ACTION,
NEW YORK STATE WIDE SENIOR ACTION
COUNCIL, PENNSYLVANIA ALLIANCE FOR
RETIRED AMERICANS, VERMONT PUBLIC
INTEREST RESEARCH GROUP, WEST
VIRGINIA CITIZEN ACTION, and WISCONSIN
CITIZEN ACTION,

Case No. 01-12257PBS

Plaintiffs

v.

AGREED MOTION TO ENLARGE TIME TO RESPOND TO COMPLAINT

ABBOTT LABORATORIES, INC., ALLERGAN WORLDWIDE, ALPHA THERAPEUTIC CORP., AMERICAN BIOSCIENCE, INC., AMERICAN HOME PRODUCTS, AMGEN INC., ASTRAZENECA US, AVENTIS PHARMA, BAYER AG, BAXTER INTERNATIONAL, INC., BRISTOL-MYERS SQUIBB CO., CHIRON, FUGISAWA HEALTHCARE, INC., GLAXOSMITHKLINE, PLC, GENSIA SICOR PHARMACTUTICALS, INC., GLAXO WELLCOME, INC., GLAXO WELLCOME, PLC, IMMUNEX CORP., ICN PHARMACEUTICALS, INC., HOESCHT MARION ROUSSEL, INC., ELI LILLY AND COMPANY, ONCOLOGY THERAPEUTICS NETWORK CORP., PHARMACIA CORP., SCHERING-PLOUGH, CORP., SICOR, INC., SMITHKLINE BEECHAM CORPORATION, TAKEDA CHEMICAL INDUSTRIES LTD., TAP PHARMACEUTICAL PRODUCTS, INC., AND JOHN DOES 1 – 200,

Defendants.

SIS#S

Pursuant to Fed. R. Civ. P. 6(b), defendant American Home Products Corporation moves to enlarge the time within which it must answer, move, plead, or otherwise respond to the Complaint in this action through and including March 21, 2002.

Plaintiffs agree to this extension.

AMERICAN HOME PRODUCTS CORP., By its Attorneys,

William F. Lee (BBO # 291960) James C. Burling (BBO # 065960)

Hale and Dorr LLP 60 State Street Boston, MA 02109

Telephone: (617) 526-6000 Facsimile: (617) 526-5000

AGREED:

Thomas M. Sobol (TMS 471770)

Nicole Y. Brumsted (NYB 3557) Lieff Cabraser Heimann &

Bernstein, LLP 175 Federal Street, 7th Floor

Boston, MA 02110

Telephone: (617) 720-5000 Facsimile: (617) 729-5015

Michael J. Flannery Carey & Danis, LLC 676 North Michigan Avenue Suite 3110 Chicago, IL 60611

Telephone: (312) 649-0100 Facsimile: (312) 649-0603

David J. Bershad J. Douglas Richards Michael M. Buchman Milberg Weiss Bershad Hynes & Lerach, LLP One Pennsylvania Plaza New York, NY 10119-0165 Telephone: (212) 594-5300 Facsimile: (212) 868-1229

Robert G. Eisler Lieff Cabraser Heimann & Bernstein, LLP 780 Third Avenue 48th Floor New York, NY 10017-2024 Telephone: (212) 355-9500 Facsimile: (212) 355-9592

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon the attorneys of record for the plaintiffs by facsimile on January 28, 2002.

Thomas M. Sobol (TMS 471770) Nicole Y. Brumsted (NYB 3557) Lieff Cabraser Heimann & Bernstein, LLP 175 Federal Street, 7th Floor Boston, MA 02110 Telephone: (617) 720-5000 Facsimile: (617) 729-5015

Michael J. Flannery Carey & Danis, LLC 676 North Michigan Avenue Suite 3110 Chicago, IL 60611 Telephone: (312) 649-0100 Facsimile: (312) 649-0603

David J. Bershad J. Douglas Richards Michael M. Buchman Milberg Weiss Bershad Hynes & Lerach, LLP One Pennsylvania Plaza New York, NY 10119-0165 Telephone: (212) 594-5300 Facsimile: (212) 868-1229

Robert G. Eisler Lieff Cabraser Heimann & Bernstein, LLP 780 Third Avenue 48th Floor New York, NY 10017-2024 Telephone: (212) 355-9500 Facsimile: (212) 355-9592

James C Burling